



U.S. Department of Justice

---

950 Pennsylvania Avenue NW  
Washington, D.C. 20530

September 27, 2024

**VIA CM/ECF**

Hon. Dale E. Ho  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho,

The Government respectfully submits this letter motion requesting permanent sealing of its forthcoming Opposition Brief to a witness's motion to quash deposition subpoena. While the Government's Opposition Brief will not list witness names, it will provide enough identifying details that a knowledgeable third-party might be able to infer the identities of two witnesses in this case. The Court has expressed a willingness to shield witness identity in this case, particularly when witnesses express concern for their livelihood or safety if their identities were made public. *See, e.g.*, ECF Nos. 122, 227. Accordingly, the Government requests that its forthcoming Opposition Brief be permanently sealed to protect the identities of the two witnesses discussed therein.

APPLICATION GRANTED. The presumption of public access to judicial documents is overcome here. *See Walker v. City of New York*, No. 15 Civ. 500, 2017 WL 2799159, at \*6 (E.D.N.Y. June 27, 2017) (witness safety is "a higher value" justifying redaction).

The Clerk of the Court is respectfully directed to place ECF No. 268 under seal, and to close ECF No. 267.  
SO ORDERED.

A handwritten signature in blue ink, appearing to read "Dale E. Ho".

DALE E. HO  
United States District Judge  
Dated: September 30, 2024  
New York, New York

Respectfully Submitted,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York  
U.S. Department of Justice

By: /s/ Jennifer Jude  
JENNIFER JUDE  
DOMINIKA TARCZYNSKA  
Assistant U.S. Attorneys  
Southern District of New York

MARGARET A. MOESER  
Acting Chief  
Money Laundering and Asset Recovery  
Section, Criminal Division  
U.S. Department of Justice

By: /s/ Joshua L. Sohn  
JOSHUA L. SOHN  
D. HUNTER SMITH  
Trial Attorneys  
Money Laundering and Asset Recovery  
Section

JENNIFER KENNEDY GELLIE  
Executive Deputy Chief  
Counterintelligence and Export Control  
Section, National Security Division  
U.S. Department of Justice

By: /s/ Yifei Zheng  
YIFEI ZHENG  
Trial Attorney  
Counterintelligence and Export Control  
Section

cc: Claimants' counsel (by ECF)